

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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| In the Matter of |) | |
| |) | |
| Service Rules for Advanced Wireless Services |) | WT Docket No. 04-356 |
| in the 1915-1920 MHz, 1995-2000 MHz, |) | |
| 2020-2025 MHz and 2175-2180 MHz Bands |) | |
| |) | |
| Service Rules for Advanced Wireless Services |) | WT Docket No. 02-353 |
| in the 1.7 GHz and 2.1 GHz Bands |) | |

REPLY COMMENTS

ICO Satellite Services G.P. (“ICO”) hereby submits these reply comments on the Notice of Proposed Rulemaking (“NPRM”) in the above-referenced dockets, which seeks comments on service rules for operations of advanced wireless services (“AWS”) in frequency bands adjacent to those allocated to 2 GHz mobile satellite services (“MSS”).¹ ICO generally supports the Commission’s tentative conclusions with respect to mitigation of interference into the 2000-2020 MHz band, but offers more specific comments below.

ICO is concerned that base stations operating in the 1995-2000 MHz band could cause harmful interference to MSS satellite receivers and to ancillary terrestrial component (“ATC”) base stations. It is therefore imperative that transmitters in the 1995–2000 MHz band include appropriate filtering and guard bands to protect both satellite receivers and ATC base stations operations in the adjacent 2000–2020 MHz band. ICO supports the proposals submitted by TerreStar Networks Inc. (“TerreStar”) to mitigate interference from H-block transmission into MSS system operations in the 2000-2020 MHz frequency band.² The additional methods for interference mitigation discussed in the NPRM, including stricter out-of-band emissions limits on

¹ *Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands*, Notice of Proposed Rulemaking, 19 FCC Rcd 19263, ¶¶ 93-98, 110-112 (2004) (“Notice”).

² Comments of Terrestar Networks, Inc., WT Docket Nos. 04-356 and 02-353 (Dec. 8, 2004) (urging the Commission to provide at least 1 MHz guard band at 1999-2000 MHz, and to require H-block entrants to coordinate with and provide filters to ATC base stations).

PCS/AWS base station transmission and limits on PCS/AWS base station power to avoid ATC base station receiver overload, should also be incorporated to prevent harmful interference into MSS and ATC systems.

ICO supports the Commission's tentative conclusion that AWS licensees operating in the 2020-2025 MHz band should be required to operate only mobile stations in the band, to ensure that operations in the band are compatible with the use of the MSS/ATC spectrum below 2020 MHz. The Commission should further ensure the compatibility of AWS operations, with MSS operations in the 2000-2020 MHz band, by requiring that AWS licensees comply with out-of-band emission limits that are at least as stringent as those imposed on MSS and ATC licensees.

Respectfully submitted,

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